

LAW OFFICE OF LAURA WONG-PAN PLLC

-Attorney & Counselor at Law-

319 Mill Street
Poughkeepsie, New York 12601

Telephone: (845) 218-1288

Facsimile: (845) 684-0007

www.laurawongpanlaw.com

February 16, 2022

FILED BY ECF

Hon. Vincent L. Briccetti
United States District Judge
United States District Court
300 Quarropas Street, Room 630
White Plains, New York 10601

Re: Northrop v. Pawling Corporation and The Presray Corporation
SDNY Civil Action No. 21-CV-04772-VB

Judge Briccetti:

The parties have reached a tentative settlement in this case and are working out the language for the non-monetary portions of the settlement agreement. We jointly request that the Court stay discovery for a period of 90 days. The reason for the delay is that we are waiting to receive a response from the U.S. Centers for Medicare and Medicare Services (CMS) about the existence and amount of any Medicare Liens, and we are unable to finalize a settlement until we have information about any liens. This process, to my understanding, can take several months.

Thank you for your consideration.

Respectfully,

/s/ Laura Wong-Pan

Laura Wong-Pan

cc: Michael Abitabilo, Esq.